

Appendix B

I. BACKGROUND

The community service and self-sufficiency requirement is a legislative mandate by Congress as part of the Public Housing Reform Act of 1998 (PHRA). This provision follows some of the themes of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, also known as the Welfare Reform Act, by requiring low-income families in public housing to contribute or participate for 8 hours a month in a community service or self-sufficiency activity or combination of both, as a condition of receipt of Federal housing assistance.

In response to the PHRA of 1998, the Housing and Community Development Corporation of Hawaii (THE CORPORATION) developed the Community Service Program. The community service and self-sufficiency provision of the PHRA is intended to assist adult residents in improving their own and their community's economic and social well-being and give residents a greater stake in their communities. The provision is not intended to be perceived as punitive, but rather considered a rewarding activity that will assist residents.

II. DEFINITIONS

"Applicant" means an individual or family who submits an application for admission to the federal public housing program but is not yet a participant in the program.

"Community Service" means the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community as defined in 24 CFR 906.601

"Corporation" means the Housing and Community Development Corporation of Hawaii, the successor to the Hawaii Housing Authority.

"Economic Self-sufficiency program" means programs that are geared towards achieving economic independence and are focused on an individual's or family's ability to provide financially to the welfare of the family.

"Exempt resident" means a person who is has fulfilled specific criteria as defined herein, have provided adequate written documentation, and are not required to participate in the Corporation's Community Service Program.

"Participant" means a person or family that is receiving rental assistance in the program. Participation begins on the first day of the approved lease

"Social Self-sufficiency programs" means programs that are aimed at improving an individual's life skills capacity. Program objectives may include increasing problem solving skills, assuming personal responsibility, improving interpersonal relationships, learning and practicing healthy beliefs and operating with clear standards about acceptable behaviors.

III. PROGRAM DESCRIPTION

Program Benefits. Residents participating in community service and self sufficiency activities are persons who are unemployed and may have been out of the work force for some period of time. Depending upon the type of activities under the Corporation's program, residents can benefit from participation in these activities including:

- Significant experience or exposure to various volunteer work or duties that are a public benefit and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-sufficiency in the community.
- Opportunity to explore training and employment areas that may not have been available in the past.
- Opportunity to be exposed to different types of job skills and work environments.
- Contacts with possible agencies or employers that the resident may never have had the opportunity to interact with prior to this experience.
- Increased confidence in the residents' skills and abilities that may encourage them to pursue permanent employment or training.

IV. PROGRAM REQUIREMENTS AND IMPLEMENTATION

- A. Requirements. The provision requires performing either 8 hours of community services, participating in 8 hours of an economic self-sufficiency program, or performing a combination of both for 8 hours per month.

For example, a resident can combine 6 hours of community service activities with 2 hours of self-sufficiency training to meet the 8 hour requirement.

- B. Start Date. Program implementation is scheduled to begin July 1, 2001 for all new applicants and all current adult residents as follows:

1. All new applicants after October 1, 2001, shall be required to comply with the community service and self-sufficiency provision as detailed in their lease agreement.
2. Upon start of the new program, all current residents shall be informed of their exempt or nonexempt status 30 days prior to their next recertification. During their recertification, residents shall be required to execute a new 12-month lease agreement which details the terms and conditions of their tenancy and participation in the Community Service Program.

V. PROGRAM ADMINISTRATION

- A. Program Administrator. The community service and self-sufficiency program shall be implemented by the Corporation's Property Management and Maintenance Branch staff. The Resident Services Section shall provide administrative support the management units in the implementation of the program.
- B. The Corporation shall enter into a formal written agreement with the Department of Human Services to coordinate the verification of participation in community service activities or duties in compliance with the Community Service Requirement.
- C. The Corporation shall maintain documentation of a resident's exempt or nonexempt status and documentation of community service performance in the participant files.
- D. Documentation shall include written verification by a third party. Documentation must include the resident's name and address, the dates and number of hours of service performed, and certification by the third party that the service was performed in compliance with the Community Service Requirement.

VI. NOTIFICATION REQUIREMENT

- A. Applicant Notification. All applicants will be notified of the community service requirement during their initial interview. Applicants will be provided information about the community service and self-sufficiency provision and provided a written description of the program.

The program description will include information regarding the general program policy; determination of exempt and nonexempt family members, description of the process for reviewing compliance, and required documentation for service requirement performance.

- B. Resident Notification. All current residents will be provided written notice of the community service and self-sufficiency requirement and a description of program procedures, and informed through community meetings. The Corporation will send each household a copy of the program description no later than June 1, 2001.

The program description will include information regarding the general program policy; determination of exempt and nonexempt family members, description of the process for reviewing compliance, and required documentation for service requirement performance.

- C. Reminders. Residents will be sent a quarterly reminder to provide the Corporation with documentation of their service activities during the lease period.

VII. REQUIRED PARTICIPANTS AND EXEMPTIONS

- A. This requirement applies to all adult applicants in the household who are determined to be nonexempt. Families will be obligated under their lease to comply with the community service and self-sufficiency requirement.
- B. Exemptions. Community service and self-sufficiency policies apply to all nonexempt, adult residents in public housing. Persons exempt from community service include applicants or residents who are:
1. Age 62 years or older;
 2. Blind or disabled (as defined under 216(i)(1) or 1614 of the Social Security Act (42 U.S.C. 416(i)(1); 1382c) and who certify that because of this disability they are unable to comply with the service provisions; or primary caretaker of such individuals.
 3. Engaged in work activities (defined in section 407(d) of the Social Security Act (42 U.S.C. 607(d)) as the following:
 - i. Unsubsidized employment.
 - ii. Subsidized private-sector employment.
 - iii. Subsidized public-sector employment.
 - iv. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private-sector employment is not available.
 - v. On-the-job training.
 - vi. Job search and job-readiness assistance.
 - vii. Community service programs.
 - viii. Vocational educational training (not to exceed 12 months with respect to any individuals).
 - ix. Job skills training directly related to employment.

- x. Education directly to employment in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency.
 - xi. Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a resident who has not completed secondary school or received such certificate.
 - xii. The provision of childcare services to an individual who is participating in a community service program.
- 4. Meet the requirements for being exempt from having to engage in a work activity under the state program funded under part A of title IV of the Social Security Act (42 U.S.C. 601 *et seq.*) or under any other welfare program of the state in which the PHA is located, including a State-administered welfare-to-work program.
 - 5. Members of a family receiving assistance, benefits, or services under the State program funded under part A of title IV of the Social Security Act (42 U.S.C. 601 *et seq.*), or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program and has not found by the state or other administering entity to be in noncompliance with such a program.

VIII. VERIFICATION OF EXEMPT STATUS

- A. Residents and applicants who have demonstrated general eligibility criteria for exemption:
 - 1. Elderly (persons 62 years or older); and/or
 - 2. Blind or disabled or primary caretakers of such individual.
 Are not required to provide any additional verification to the Corporation to meet the exempt status under the community service and self-sufficiency provision.

Residents or applicants with a disability who wish to be exempt, must self-certify that they are unable to participate in the service requirement due to the nature of their disability

- B. Persons who are exempt because of their participation in a welfare-to-work program administered by the Department of Human Services, shall be required to provide written documentation and sign a release of information form
- C. Residents and/or applicants who meet the requirements for an exempt status shall submit written documentation to that extent to the Corporation. All current residents shall submit documentation to the

Corporation at least 30 days prior to their next recertification appointment; All new applicants shall submit documentation within 30 days of acceptance and placement in the program.

- D. Any changes to the exempt or nonexempt status must be reported to the Corporation's project management staff within 30 days of the change

IX. PROGRAM PARTICIPATION AND ELIGIBLE ACTIVITIES

- A. Community Service Activities. The term community service is defined in 24 CFR 906.601 as the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. The following examples are considered community service activities:

1. Actively participating in a community Voluntary Tenant Patrol;
2. Participating in an anti-graffiti program by monitoring and eliminating graffiti in the housing community;
3. Assisting in grounds maintenance and community beautification projects;
4. Assisting with a literacy and self-esteem program in an afterschool youth program;
5. Assisting in a senior center providing elderly families with information on various services such as transportation, meals, etc;
6. Assisting in a homeless shelter kitchen;
7. Volunteering at the foodbank;
8. Assisting with a youth sports or mentoring program;
9. Tutoring programs;
10. Assisting project management staff to inform the community about upcoming events and meetings, new rules, etc; and
11. Assisting project management staff by serving as an interpreter for non-English speaking families.

- B. Self-Sufficiency Activities. The term economic self-sufficiency is defined in 24 CFR 5.603 as any self-sufficiency program designed to encourage, assist, training, or facilitate the economic independence of public housing residents or families to provide work for such families. The following are examples activities that meet the definition of self-sufficiency program:

1. Job training (such as basic office skills, resume writing, interview skills, dress for success, office equipment);
2. Employment counseling;
3. Work placement;
4. Basic skills training;
5. Education (such as secondary education);
6. English proficiency;

7. Financial management or budgeting classes;
8. Household management;
9. Life skills (such as health and wellness classes);
10. Apprenticeship or vocational training;
11. Substance abuse treatment;
12. Mental health treatment program;
13. HUD's Family Self-Sufficiency program;
14. HUD's Resident Opportunity and Self-Sufficiency program; and
15. HUD's HOPE VI program.

C. Ineligible Activities.

1. Part-time or full-time employment (including seasonal or temporary employment);
2. Political activities, such as lobbying, campaigning, advocacy activities;
3. Activities performed or work ordinarily performed by the Corporation's employees;
4. Community Service activities shall not replace a job at any administrative office or public housing complex where residents perform activities to satisfy the service requirement (24 CFR 960.609).

D. Referrals. To the extent practicable, residents will be provided a list with a minimum of 3 referrals to call to locate appropriate community service opportunities or training programs. Residents are expected to make their own attempts to locate appropriate activities by contacting their Manager, Resident Service Section, or local service providers.

E. New applicants will have 60 days after placement into public housing to locate and begin their community service or self-sufficiency activities.

F. Documentation. Residents are required to obtain written documentation of their fulfillment of the community service and self-sufficiency requirement. All documentation is due to the project management office 30 days prior to the resident's next recertification.

X. COMPLIANCE AND GRIEVANCES

- A.** Residents are responsible for the following:
1. Provide and cooperate with the Corporation regarding verification of exempt or nonexempt status for the community service and self-sufficiency requirement;
 2. Report any changes regarding exempt or nonexempt status to the Corporation within 30 days;

3. For all adult residents in public housing, except those determined to be exempt, contribute 8 hours per month of community service or participate in an economic self-sufficiency program for 8 hours per month or perform a combination of both for 8 hours per month, and
 4. Provide the Corporation with information verifying compliance with service requirements including the number of hours accomplished under this activity 30 days prior to their next recertification.
- B. Under this provision of law, noncompliance with the community service and self-sufficiency requirement is a lease violation and is grounds for nonrenewal of the lease at the end of a 12-month lease term, but not for termination of tenancy during the course of the 12-month lease term.
- C. The Corporation shall provide written notification to residents in noncompliance in the event that the resident is not fulfilling his or her obligation. The notice will describe the noncompliance and inform the resident that their lease shall not be renewed at the end of the current 12-month lease term unless the resident complies with the written agreement to cure noncompliance.
- D. If a resident or another adult family member has violated the community service and self-sufficiency requirement, the Corporation shall not renew the lease agreement upon expiration of the term unless the following conditions are met:
1. The resident and any other noncompliant resident enter into a written agreement with the Corporation to cure such noncompliance by completing the additional hours required over the 12-month term of the new lease; and
 2. All other family members who are subject to the community services and self-sufficiency requirement are currently complying with the requirement or are no longer residing in the unit.
- E. Residents shall be afforded the opportunity to enter into a written agreement with the Corporation to cure the noncompliance in accordance with the agreement. The agreement shall include:
1. The additional number of hours service or activities needed to make up the total number of hours required over the 12-month term of the new lease; and
 2. Assurance that all members of the family who are subject to the community service and self-sufficiency requirement are currently complying; or
 3. Written assurances satisfactory to the Corporation that the resident or other noncompliant family member no longer resides in the unit.

- F. Residents may request a grievance hearing pursuant to Chapter 15-183 Hawaii Administrative Rules, on the Corporation's determination of noncompliance in accordance with the terms of their current lease agreement or may exercise any judicial remedy to seek timely redress for the Corporation's nonrenewal of the lease because of such determination